

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**ANDRE LAMONT BOYD, on behalf of
Himself and all others similarly situated,**

Plaintiff,

Civil Action No. 3:13cv150

v.

CEVA FREIGHT, LLC,

CEVA LOGISTICS, LLC,

CEVA LOGISTICS NORTH AMERICA,

CEVA LOGISTICS, U.S. INC.,

and

JOHN DOE, INC.

Defendants.

CONSENT MOTION FOR AN EXTENSION OF TIME

Defendants CEVA Freight, LLC (“CEVA Freight”), CEVA Logistics, LLC (“CEVA Logistics”) and CEVA Logistics U.S., Inc. (“CEVA Logistics U.S.”) (collectively “Defendants”), by counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 7(F)(2)(b), file this Consent Motion for an Extension of Time to extend to October 4, 2013 the time within which Defendants must file their Reply in Support of their Motion for Partial Judgment on the Pleadings.

On August 26, 2013, Defendants filed a Motion for Partial Judgment on the Pleadings (“Motion”) and a Memorandum in Support thereof (ECF 26 and 27, respectively). Plaintiff subsequently filed a Motion for Enlargement of Time, seeking an enlargement of his time to file his response to the Motion. (ECF 32). The Court granted Plaintiff’s request (ECF 33). Plaintiff

then filed a Second Motion for Enlargement of Time to File His Opposition to Defendants' Motion for Partial Judgment on The Pleadings, requesting leave to file his brief by the close of business on September 17, 2013 (ECF 34). In his motion, Plaintiff stated that he "[would] consent to a comparable enlargement on Reply."

As a result, with Plaintiff's consent and for good cause shown, Defendants request an extension of the deadline in which to file their reply brief from Friday September 27, 2013 to Friday October 4, 2013. Defendants have attached a proposed Consent Order hereto.

**CEVA FREIGHT, LLC, CEVA
LOGISTICS, LLC and CEVA LOGISTICS
U.S., INC.**

By: /s/ David M. Gettings

David M. Gettings (VSB No. 80394)

John C. Lynch (VSB No. 39267)

*Attorneys for CEVA Freight, LLC, CEVA
LOGISTICS, LLC, and CEVA LOGISTICS
U.S., INC.*

TROUTMAN SANDERS LLP

222 Central Park Ave., Suite 2000

Virginia Beach, Virginia 23462

Telephone No. (757) 687-7747

Facsimile No. (757) 687-1545

Email: david.gettings@troutmansanders.com

Email: john.lynch@troutmansanders.com

CERTIFICATE OF SERVICE

I certify that on the 26th day of September, 2013, I electronically filed the foregoing Consent Motion for an Extension of Time with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

Counsel for Plaintiff

Leonard Anthony Bennett
Consumer Litigation Associates
763 J Clyde Morris Boulevard
Suite 1A
Newport News, VA 23601
757-930-3660
Fax: 757-930-3662
Email: lenbennett@clalegal.com

Anthoney R. Pecora
Stumphauzer, O'Toole, McLaughlin, McGlamery & Loughman
5455 Detroit Rd
Sheffield Village, OH 44054
(440) 930-4017
Email: apecora@sheffieldlaw.com

Matthew A. Dooley
Stumphauzer, O'Toole, McLaughlin, McGlamery & Loughman
5455 Detroit Rd
Sheffield Village, OH 44054
(440) 930-4001
Email: mdooley@sheffieldlaw.com

Susan Mary Rotkis
Consumer Litigation Associates
763 J Clyde Morris Boulevard
Suite 1A
Newport News, VA 23601
757-930-3660
Fax: (757) 930-3662
Email: srotkis@clalegal.com

/s/ David M. Gettings

John C. Lynch (VSB No. 39267)

David M. Gettings (VSB No. 80394)

*Attorneys for CEVA Freight, LLC, CEVA
LOGISTICS, LLC, and CEVA LOGISTICS U.S.,
INC. TROUTMAN SANDERS LLP*

222 Central Park Ave., Suite 2000

Virginia Beach, Virginia 23462

Telephone No.: (757) 687-7765

Facsimile No.: (757) 687-7515

Email: john.lynch@troutmansanders.com